

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

FELLOWS, INC.,

Plaintiff,

V.

AURORA CORPORATION OF AMERICA,

and,

AURORA OFFICE EQUIPMENT, LTD.

Defendants.

**Civil Action No.: 07 C 7237**

**District Judge: Korcoras**

### Magistrate Judge: Keys

**JURY TRIAL REQUESTED**

**PLAINTIFF FELLOWS, INC.'S DISCLOSURES OF ASSERTED CLAIMS AND  
INFRINGEMENT CONTENTIONS AS TO AURORA CORPORATION OF AMERICA AND  
AURORA OFFICE EQUIPMENT, LTD.**

Plaintiff Fellowes, Inc. (hereinafter “Fellowes”) hereby makes its Disclosure of Asserted Claims and Infringement Contentions (hereinafter “Infringement Contentions”) against Defendants Aurora Corporation of America and Aurora Office Equipment, LTD. (hereinafter jointly “Aurora”). Because discovery is ongoing and both defendants have thus far refused to produce documents concerning models other than those Fellowes specifically identified in its Complaint, Fellowes reserves the right to add additional claims that are infringed by Aurora and/or additional Aurora products that infringe an asserted claim and may further supplement these Infringement Contentions upon a showing of good cause.

## I. INFRINGED CLAIMS

Plaintiff Fellowes currently asserts at least Claims 1, 14, 15, and 16 of the original U.S.

Patent No. 7,040,559 (hereinafter “the ‘559 patent”) as being infringed by Defendants Aurora under 35 U.S.C. § 271(a), (b), and/or (c). Plaintiff further currently asserts at least Claims 38, 40, 41, 42, 43, 44, 45, 46, 47, 49, 50, and 51 of the Reexamination Certificate of the ‘559 patent, which was issued by the United States Patent and Trademark Office on July 22, 2008, as being infringed by Defendants Aurora under 35 U.S.C. § 271(a), (b), and/or (c).

Plaintiff Fellowes currently asserts at least Claims 1, 2, 5-7, 12-14, 22-24, 27-28, 31-34, 37-38, 41-44, 47-48, 51-54, 57-58, 61-64, 67-70, 73-76, 79-81, 84-85, 88-90, 93-94, 97-99, 102-103, 106-108, and 111-112 of U.S. Patent No. 7,311,276 (hereinafter “the ‘276 patent”) as being infringed by Defendants Aurora under 35 U.S.C. § 271(a), (b), and/or (c).

Plaintiff Fellowes currently asserts at least Claims 1, 11, 14, 16, 19, 20, 27, 29, 32, 34, 36, 39, 40, 42, 45, 46, 48, 51, 53, 55, 57, 60, 62, 64, and 67 of U.S. Patent No. 7,344,096 (hereinafter “the ‘096 patent”) as being infringed by Defendants Aurora under 35 U.S.C. § 271(a), (b), and/or (c).

## **II. IDENTIFICATION OF ACCUSED INSTRUMENTALITIES**

Plaintiff Fellowes, for each asserted claim, each accused apparatus, product, device, process, method, act, or other instrumentality (hereinafter “Accused Instrumentality”) of Defendants Aurora jointly and severally, that Plaintiff is aware of:

### **A. THE ‘559 PATENT**

*See* infringement chart attached as Appendix A and accompanying figures in Appendix D.

### **B. THE ‘276 PATENT**

*See* infringement chart attached as Appendix B and accompanying figures in Appendix D.

C. THE '096 PATENT

See infringement chart attached as Appendix C and accompanying figures in Appendix

D.

III. CONCLUDING STATEMENTS

Plaintiff Fellowes reserves the right to unilaterally modify and supplement, without prejudice, its Disclosure of Asserted Claims, Identification of Accused Instrumentalities, and Infringement Contentions. Plaintiff Fellowes fully intends to modify and supplement said Disclosure of Asserted Claims, Identification of Accused Instrumentalities, and Infringement Contentions and/or submit Amended Infringement Contentions after Plaintiff Fellowes has been given the opportunity to complete discovery and an inspection of the infringing devices, whether identified in these Infringement Contentions or otherwise.

Dated: August 21, 2008

Fellowes, Inc.

By its Attorneys,



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